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PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

November 1, 2007
(PBW Project No. 1352)

VIA OVERNIGHT DELIVERY

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-AP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Phase 1-2 Wetland Sediment Investigation Data and Proposed Phase 3 Wetland Sediment
Investigation Activities, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

This letter has been prepared to provide a summary of Phase 1 and 2 wetland sediment data collected as part of the Remedial Investigation/Feasibility Study (RI/FS) at the subject site (the Site), and to propose Phase 3 wetland sediment investigation activities to be performed on the basis of those data. This information is provided by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). In accordance with Paragraph 52 of the modified Unilateral Administrative Order for the Site, I certify that I have been fully authorized by the Respondents to submit these documents and to legally bind all Respondents thereto.

EXISTING DATA SUMMARY

In accordance with Section 5.6.7 of the RI/FS Work Plan (the Work Plan), wetland sediment samples were collected for chemical analysis from the 0 to 0.5 foot depth interval at 17 grid-based locations on that part of the Site north of Marlin Avenue (hereafter referred to as the North Area). At 10 of these locations, where saturated conditions were not encountered at depths less than 2 feet (see Table 1), samples were also collected from the 1 to 2 foot depth interval. In addition, Phase 2 wetland sediment samples were collected from 17 on-site and off-site locations selected based on field observations, particularly with regard to potential drainage areas. All of these wetland sediment sample locations are shown on Figure 1.

In accordance with the Work Plan provisions, the analytical data from these samples were used to evaluate the lateral extent of contamination in wetland sediments, and assess the need for additional wetland sediment sampling activities. This evaluation entailed a comparison to Preliminary Screening Values (PSVs) for sediment as listed in Table 21 of the Work Plan, subject to a comparison to background concentrations. Given the similar composition and condition of the surface soils collected from within the approved background soil area approximately 2,000 feet east of the Site near the east end of Marlin Avenue as part of the Site-specific background



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investigation to the wetland sediments in the North Area, the Site-specific background values determined from those samples, as described in my September 11, 2007 letter to you, were used to represent background wetland sediment concentrations for the purposes of evaluating the lateral extent of contamination.

Comparison values for each chemical of interest (COI) in wetland sediments are listed in Table 2. These values are the higher of each COI's PSV or background value (where applicable). The PSVs listed in Table 2 are from Table 21 of the Work Plan, with adjustments for changes in TCEQ Protective Concentration Levels (PCLs) since 2005. Table 3 lists detected COI concentrations in wetland sediment samples that exceed the Table 2 comparison values. These exceedences are also plotted by location on Figure 1.

PROPOSED PHASE 3 WETLAND SEDIMENT INVESTIGATION ACTIVITIES

The Work Plan specifies that where exceedences are indicated at perimeter locations, then additional sediment samples should be collected to define the lateral extent of contamination. To address this requirement, nine additional wetland sediment samples are proposed at the locations shown on Figure 3. These samples will be collected from the 0 to 0.5 foot depth interval in accordance with the methods and procedures specified in the Work Plan and the Field Sampling Plan. The proposed analyses for these samples are specified in Table 4.

As noted previously, the Work Plan provides for the collection of wetland sediment samples from the 1 to 2 foot depth interval at locations in the North Area (i.e., on-site) where saturated conditions are not encountered above a depth of 2 feet. As listed in Table 1, saturated conditions were not observed in the 0 to 0.5 foot depth interval at three North Area Phase 2 sample locations (2WSED8, 2WSED9, and 2WSED10). Consistent with Work Plan requirements, samples will be collected from the 1 to 2 foot depth interval at these locations. If saturated conditions are not observed in these samples, then the samples will be analyzed as specified in Table 4. If saturated conditions are observed in a given sample, then analyses will not be performed on that sample.

Thank you for the opportunity to submit this information. Please review and provide any comments on the proposed activities at your earliest convenience, so we can continue to move forward with the expeditious completion of the RI/FS.

Sincerely,

PASTOR, BEHLENG & WHEELER, LLC

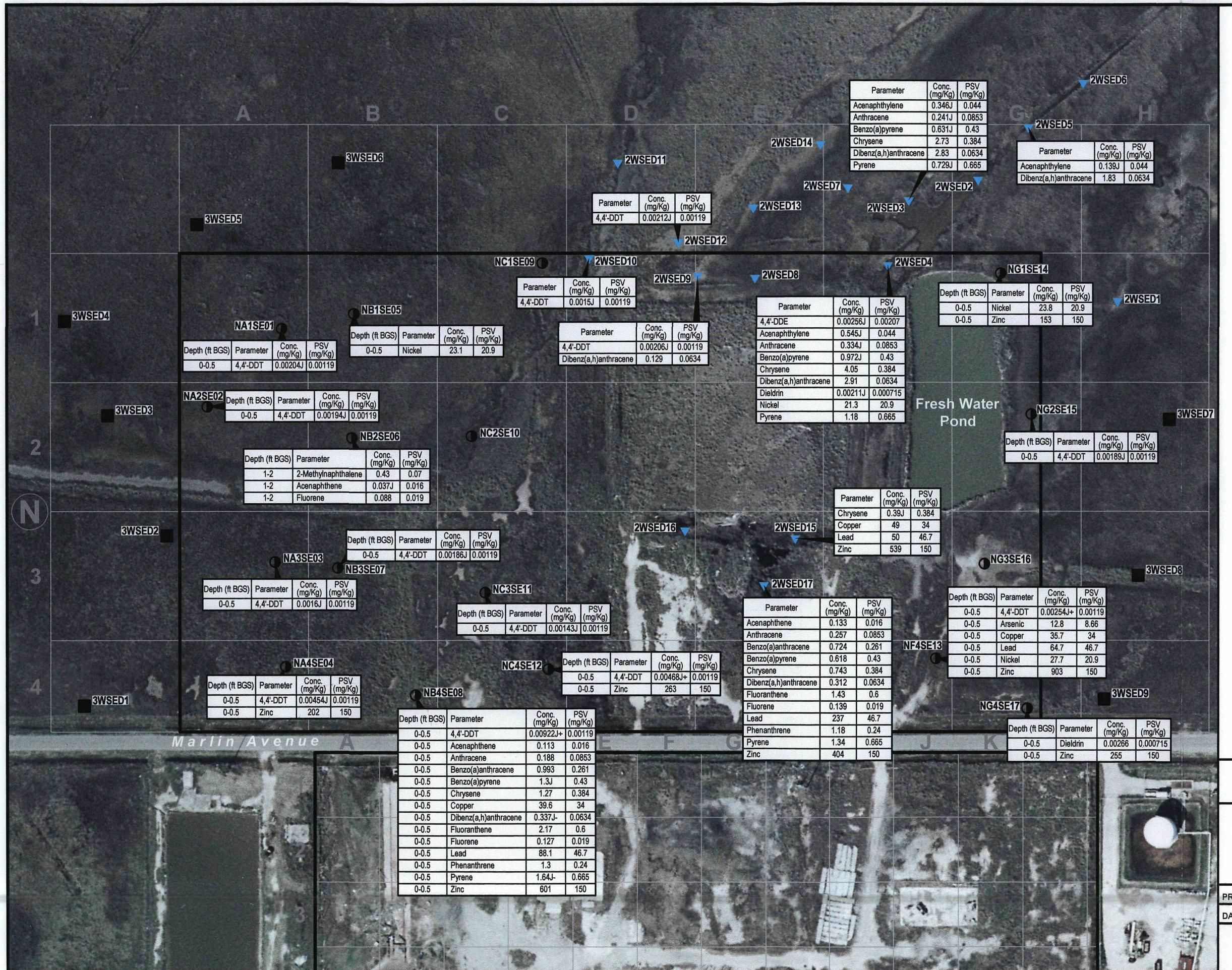


Eric F. Pastor, P.E.
Principal Engineer

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cc: Ms. Luda Voskov - Texas Commission on Environmental Quality
Mr. Robert L. Iuliucci - Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Donnie Belote – The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morris III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

FIGURE



TABLES

TABLE 1 - WETLAND SEDIMENT SATURATION CONDITION SUMMARY

Sample Location	Sample Depth (ft)	Saturation Condition
NA1SE01	0-0.5	Saturated
NA2SE02	0-0.5	Saturated
NA3SE03	0-0.5	Not Saturated
	1-2	Not Saturated
NA4SE04	0-0.5	Not Saturated
	1-2	Not Saturated
NB1SE05	0-0.5	Saturated
NB2SE06	0-0.5	Not Saturated
	1-2	Not Saturated
NB3SE07	0-0.5	Not Saturated
	1-2	Not Saturated
NB4SE08	0-0.5	Not Saturated
	1-2	Not Saturated
NC1SE09	0-0.5	Not Saturated
	1-2	Not Saturated
NC2SE10	0-0.5	Not Saturated
	1-2	Not Saturated
NC3SE11	0-0.5	Not Saturated
	1-2	Not Saturated
NC4SE12	0-0.5	Saturated
NF4SE13	0-0.5	Not Saturated
	1-2	Not Saturated
NG1SE14	0-0.5	Saturated
NG2SE15	0-0.5	Not Saturated
	1-2	Saturated
NG3SE16	0-0.5	Not Saturated
	1-2	Not Saturated
NG4SE17	0-0.5	Not Saturated
	1-2	Saturated

TABLE 1 - WETLAND SEDIMENT SATURATION CONDITION SUMMARY

Sample Location	Sample Depth (ft)	Saturation Condition
2WSED1	0-0.5	Not Saturated
2WSED2	0-0.5	Saturated
2WSED3	0-0.5	Saturated
2WSED4	0-0.5	Saturated
2WSED5	0-0.5	Saturated
2WSED6	0-0.5	Not Saturated
2WSED7	0-0.5	Not Saturated
2WSED8	0-0.5	Not Saturated
2WSED9	0-0.5	Not Saturated
2WSED10	0-0.5	Not Saturated
2WSED11	0-0.5	Not Saturated
2WSED12	0-0.5	Not Saturated
2WSED13	0-0.5	Not Saturated
2WSED14	0-0.5	Not Saturated
2WSED15	0-0.5	Saturated
2WSED16	0-0.5	Saturated
2WSED17	0-0.5	Saturated

TABLE 2 - EXTENT EVALUATION COMPARISON VALUES⁽¹⁾

Chemicals of Interest	Potential Preliminary Screening Values (PSVs) from Table 21 of RI/FS Workplan ⁽²⁾			PSV (mg/kg)	Potential Site-Specific Background Values ⁽⁶⁾	Extent Evaluation Comparison Value
	Tot Sed _{Comb} ⁽³⁾	TCEQ Ecological Benchmark for Sediment ⁽⁴⁾	EPA EcoTox Threshold ⁽⁵⁾			
METALS						
Aluminum	1.53E+05	---	---	1.53E+05	---	1.53E+05
Antimony	8.32E+01	---	---	8.32E+01	---	8.32E+01
Arsenic	1.15E+02	8.20E+00	8.20E+00	8.20E+00	8.66E+00	8.66E+00
Barium	2.30E+04	---	---	8.00E+03	4.62E+02	8.00E+03
Beryllium	2.66E+01	---	---	2.66E+01	---	2.66E+01
Boron	1.07E+05	---	---	1.07E+05	---	1.07E+05
Cadmium	1.09E+03	1.20E+00	1.20E+00	1.20E+00	---	1.20E+00
Chromium	3.65E+04	8.10E+01	8.10E+01	8.10E+01	2.40E+01	8.10E+01
Chromium (VI)	1.36E+02	---	---	1.36E+02	---	1.36E+02
Cobalt	3.20E+04	---	---	3.20E+04	---	3.20E+04
Copper	2.13E+04	3.40E+01	3.40E+01	3.40E+01	2.36E+01	3.40E+01
Iron	---	---	---	NV	---	0.00E+00
Lead	5.00E+02	4.67E+01	4.67E+01	4.67E+01	1.79E+01	4.67E+01
Lithium	1.07E+04	---	---	1.07E+04	3.62E+01	1.07E+04
Manganese	1.40E+04	---	---	1.40E+04	6.50E+02	1.40E+04
Mercury	3.43E+01	1.50E-01	1.50E-01	1.50E-01	3.50E-02	1.50E-01
Molybdenum	1.84E+03	---	---	1.84E+03	7.40E-01	1.84E+03
Nickel	1.40E+03	2.09E+01	2.09E+01	2.09E+01	---	2.09E+01
Selenium	2.66E+03	---	---	2.66E+03	---	2.66E+03
Silver	3.50E+02	1.00E+00	1.00E+00	1.00E+00	---	1.00E+00
Strontium	1.52E+05	---	---	1.52E+05	---	1.52E+05
Thallium	---	---	---	NV	---	0.00E+00
Tin	9.19E+04	---	---	9.19E+04	---	9.19E+04
Titanium	1.00E+06	---	---	1.00E+06	---	1.00E+06
Vanadium	3.29E+02	---	---	3.29E+02	---	3.29E+02
Zinc	7.60E+04	1.50E+02	1.50E+02	1.50E+02	1.27E+02	1.50E+02
PESTICIDES						
4,4'-DDD	1.23E+02	1.22E-03	1.22E-03	1.22E-03	---	1.22E-03
4,4'-DDE	8.66E+01	2.07E-03	2.07E-03	2.07E-03	---	2.07E-03
4,4'-DDT	8.66E+01	1.19E-03	1.19E-03	1.19E-03	---	1.19E-03

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	Tot Sed _{Comb} ⁽³⁾	TCEQ Ecological Benchmark for Sediment ⁽⁴⁾	EPA EcoTox Threshold ⁽⁵⁾			
Aldrin	8.36E-01	---	---	8.36E-01	---	8.36E-01
alpha-BHC	4.05E+00	---	---	4.05E+00	---	4.05E+00
alpha-Chlordane	4.06E+01	---	---	4.06E+01	---	4.06E+01
beta-BHC	1.42E+01	---	---	1.42E+01	---	1.42E+01
delta-BHC	1.42E+01	---	---	1.42E+01	---	1.42E+01
Dieldrin	8.88E-01	7.15E-04	7.15E-04	7.15E-04	---	7.15E-04
Endosulfan I	3.06E+02	---	2.90E-03	2.90E-03	---	2.90E-03
Endosulfan II	9.19E+02	---	1.40E-02	1.40E-02	---	1.40E-02
Endosulfan sulfate	9.19E+02	---	---	9.19E+02	---	9.19E+02
Endrin	4.59E+01	---	3.50E-03	3.50E-03	---	3.50E-03
Endrin aldehyde	4.59E+01	---	---	4.59E+01	---	4.59E+01
Endrin ketone	4.59E+01	---	---	4.59E+01	---	4.59E+01
gamma-BHC (Lindane)	1.96E+01	3.20E-04	3.20E-04	3.20E-04	---	3.20E-04
gamma-Chlordane	4.10E+01	---	---	4.10E+01	---	4.10E+01
Heptachlor	3.16E+00	---	---	3.16E+00	---	3.16E+00
Heptachlor epoxide	1.56E+00	---	---	1.56E+00	---	1.56E+00
Methoxychlor	7.65E+02	---	1.90E-02	1.90E-02	---	1.90E-02
Toxaphene	1.29E+01	---	2.80E-02	2.80E-02	---	2.80E-02
PCBs	2.30E+00	2.27E-02		2.27E-02	---	2.27E-02
Aroclor-1016	---	---	---	NV	---	0.00E+00
Aroclor-1221	---	---	---	NV	---	0.00E+00
Aroclor-1232	---	---	---	NV	---	0.00E+00
Aroclor-1242	---	---	---	NV	---	0.00E+00
Aroclor-1248	---	---	---	NV	---	0.00E+00
Aroclor-1254	---	---	---	NV	---	0.00E+00
Aroclor-1260	---	---	---	NV	---	0.00E+00
VOCS						
1,1,1,2-Tetrachloroethane	2.10E+03	---	---	2.10E+03	---	2.10E+03
1,1,1-Trichloroethane	1.47E+05	---	1.70E-01	1.70E-01	---	1.70E-01
1,1,2,2-Tetrachloroethane	2.72E+02	---	9.40E-01	9.40E-01	---	9.40E-01
1,1,2-Trichloroethane	9.56E+02	---	---	9.56E+02	---	9.56E+02

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	Tot Sed _{Comb} ⁽³⁾	TCEQ Ecological Benchmark for Sediment ⁽⁴⁾	EPA EcoTox Threshold ⁽⁵⁾			
1,1-Dichloroethane	7.35E+04	---	---	7.35E+04	---	7.35E+04
1,1-Dichloroethene	3.67E+04	---	---	3.67E+04	---	3.67E+04
1,1-Dichloropropene	5.45E+02	---	---	5.45E+02	---	5.45E+02
1,2,3-Trichloropropane	7.79E+00	---	---	7.79E+00	---	7.79E+00
1,2,4-Trichlorobenzene	1.53E+03	---	9.20E+00	9.20E+00	---	9.20E+00
1,2,4-Trimethylbenzene	3.67E+04	---	---	3.67E+04	---	3.67E+04
1,2-Dibromo-3-chloropropane	1.01E+01	---	---	1.01E+01	---	1.01E+01
1,2-Dibromoethane	2.72E+01	---	---	2.72E+01	---	2.72E+01
1,2-Dichlorobenzene	6.61E+04	---	3.40E-01	3.40E-01	---	3.40E-01
1,2-Dichloroethane	2.70E+01	---	---	5.99E+02	---	5.99E+02
1,2-Dichloropropane	8.01E+02	---	---	8.01E+02	---	8.01E+02
1,3,5-Trimethylbenzene	3.67E+04	---	---	3.67E+04	---	3.67E+04
1,3-Dichlorobenzene	2.20E+04	---	1.70E+00	1.70E+00	---	1.70E+00
1,3-Dichloropropane	5.45E+02	---	---	5.45E+02	---	5.45E+02
1,4-Dichlorobenzene	2.27E+03	---	3.50E-01	3.50E-01	---	3.50E-01
2,2-Dichloropropane	8.01E+02	---	---	8.01E+02	---	8.01E+02
2-Butanone	4.41E+05	---	---	4.41E+05	---	4.41E+05
2-Chloroethylvinyl ether	4.95E+01	---	---	4.95E+01	---	4.95E+01
2-Chlorotoluene	3.06E+03	---	---	3.06E+03	---	3.06E+03
2-Hexanone	4.41E+04	---	---	4.41E+04	---	4.41E+04
4-Chlorotoluene	1.47E+04	---	---	1.47E+04	---	1.47E+04
4-Isopropyltoluene	7.35E+04	---	---	7.35E+04	---	7.35E+04
4-Methyl-2-pentanone	5.88E+04	---	---	5.88E+04	---	5.88E+04
Acetone	6.61E+05	---	---	6.61E+05	---	6.61E+05
Acrolein	3.67E+02	---	---	3.67E+02	---	3.67E+02
Acrylonitrile	1.01E+02	---	---	1.01E+02	---	1.01E+02
Benzene	9.91E+02	---	5.70E-02	5.70E-02	---	5.70E-02
Bromobenzene	1.47E+04	---	---	1.47E+04	---	1.47E+04
Bromodichloromethane	8.79E+02	---	---	8.79E+02	---	8.79E+02
Bromoform	6.90E+03	---	6.50E-01	6.50E-01	---	6.50E-01
Bromomethane	1.03E+03	---	---	1.03E+03	---	1.03E+03

TABLE 2 - EXTENT EVALUATION COMPARISON VALUES⁽¹⁾

Chemicals of Interest	Potential Preliminary Screening Values (PSVs) from Table 21 of RI/FS Workplan ⁽²⁾			PSV (mg/kg)	Potential Site-Specific Background Values ⁽⁶⁾	Extent Evaluation Comparison Value
	Tot Sed _{Comb} ⁽³⁾	TCEQ Ecological Benchmark for Sediment ⁽⁴⁾	EPA EcoTox Threshold ⁽⁵⁾			
Butanol	7.35E+04	---	---	7.35E+04	---	7.35E+04
Carbon disulfide	7.35E+04	---	---	7.35E+04	---	7.35E+04
Carbon tetrachloride	4.19E+02	---	1.20E+00	1.20E+00	---	1.20E+00
Chlorobenzene	1.47E+04	---	8.20E-01	8.20E-01	---	8.20E-01
Chloroethane	2.94E+05	---	---	2.94E+05	---	2.94E+05
Chloroform	7.35E+03	---	---	7.35E+03	---	7.35E+03
Chloromethane	4.19E+03	---	---	4.19E+03	---	4.19E+03
cis-1,2-Dichloroethene	7.35E+03	---	---	7.35E+03	---	7.35E+03
cis-1,3-Dichloropropene	7.35E+01	---	---	7.35E+01	---	7.35E+01
Dibromochloromethane	6.49E+02	---	---	6.49E+02	---	6.49E+02
Dibromomethane	7.27E+03	---	---	7.27E+03	---	7.27E+03
Dichlorodifluoromethane	1.47E+05	---	---	1.47E+05	---	1.47E+05
Ethylbenzene	7.35E+04	---	3.60E+00	3.60E+00	---	3.60E+00
Hexachlorobutadiene	3.06E+01	---	---	3.06E+01	---	3.06E+01
Isopropylbenzene (Cumene)	7.35E+04	---	---	7.35E+04	---	7.35E+04
Methyl acetate	7.35E+05	---	---	7.35E+05	---	7.35E+05
Methyl iodide	1.03E+03	---	---	1.03E+03	---	1.03E+03
Methylcyclohexane	1.00E+06	---	---	1.00E+06	---	1.00E+06
Methylene chloride	7.27E+03	---	---	7.27E+03	---	7.27E+03
Naphthalene	2.47E+03	1.60E-01	1.60E-01	1.60E-01	---	1.60E-01
n-Butylbenzene	6.12E+03	---	---	6.12E+03	---	6.12E+03
n-Propylbenzene	2.94E+04	---	---	2.94E+04	---	2.94E+04
o-Xylene	1.00E+06	---	---	1.00E+06	---	1.00E+06
sec-Butylbenzene	2.94E+04	---	---	2.94E+04	---	2.94E+04
Styrene	1.47E+05	---	---	1.47E+05	---	1.47E+05
tert-Butyl methyl ether (MTBE)	7.35E+03	---	---	7.35E+03	---	7.35E+03
tert-Butylbenzene	2.94E+04	---	---	2.94E+04	---	2.94E+04
Tetrachloroethene	1.05E+03	---	5.30E-01	5.30E-01	---	5.30E-01
Toluene	5.90E+04	---	6.70E-01	6.70E-01	---	6.70E-01
trans-1,2-Dichloroethene	1.47E+04	---	---	1.47E+04	---	1.47E+04
trans-1,3-Dichloropropene	5.45E+02	---	---	5.45E+02	---	5.45E+02

TABLE 2 - EXTENT EVALUATION COMPARISON VALUES⁽¹⁾

Chemicals of Interest	Potential Preliminary Screening Values (PSVs) from Table 21 of RI/FS Workplan ⁽²⁾			PSV (mg/kg)	Potential Site-Specific Background Values ⁽⁶⁾	Extent Evaluation Comparison Value
	TotSed _{Comb} ⁽³⁾	TCEQ Ecological Benchmark for Sediment ⁽⁴⁾	EPA EcoTox Threshold ⁽⁵⁾			
Trichloroethene	4.41E+03	---	1.60E+00	1.60E+00	---	1.60E+00
Trichlorofluoromethane	2.20E+05	---	---	2.20E+05	---	2.20E+05
Trichlorotrifluoroethane	1.00E+06	---	---	1.00E+06	---	1.00E+06
Vinyl acetate	7.35E+05	---	---	7.35E+05	---	7.35E+05
Vinyl chloride	3.63E+01	---	---	3.63E+01	---	3.63E+01
Xylene (total)	1.47E+05	---	---	1.47E+05	---	1.47E+05
SVOCs						
1,2Diphenylhydrazine/Azobenzen	1.78E+01	---	---	1.78E+01	---	1.78E+01
2,4,5-Trichlorophenol	1.53E+04	---	---	1.53E+04	---	1.53E+04
2,4,6-Trichlorophenol	1.29E+03	---	---	1.29E+03	---	1.29E+03
2,4-Dichlorophenol	4.59E+02	---	---	4.59E+02	---	4.59E+02
2,4-Dimethylphenol	3.06E+03	---	---	3.06E+03	---	3.06E+03
2,4-Dinitrophenol	3.06E+02	---	---	3.06E+02	---	3.06E+02
2,4-Dinitrotoluene	2.09E+01	---	---	2.09E+01	---	2.09E+01
2,6-Dinitrotoluene	2.09E+01	---	---	2.09E+01	---	2.09E+01
2-Chloronaphthalene	9.90E+03	---	---	9.90E+03	---	9.90E+03
2-Chlorophenol	3.67E+03	---	---	3.67E+03	---	3.67E+03
2-Methylnaphthalene	4.95E+02	7.00E-02	7.00E-02	7.00E-02	---	7.00E-02
2-Nitroaniline	4.59E+01	---	---	4.59E+01	---	4.59E+01
2-Nitrophenol	3.06E+02	---	---	3.06E+02	---	3.06E+02
3,3'-Dichlorobenzidine	3.16E+01	---	---	3.16E+01	---	3.16E+01
3-Nitroaniline	4.59E+01	---	---	4.59E+01	---	4.59E+01
4,6-Dinitro-2-methylphenol	3.06E+02	---	---	3.06E+02	---	3.06E+02
4-Bromophenyl phenyl ether	9.47E-01	---	1.30E+00	9.47E-01	---	9.47E-01
4-Chloro-3-methylphenol	7.65E+02	---	---	7.65E+02	---	7.65E+02
4-Chloroaniline	6.12E+02	---	---	6.12E+02	---	6.12E+02
4-Chlorophenyl phenyl ether	9.47E-01	---	---	9.47E-01	---	9.47E-01
4-Nitroaniline	3.74E+02	---	---	3.74E+02	---	3.74E+02
4-Nitrophenol	3.06E+02	---	---	3.06E+02	---	3.06E+02
Acenaphthene	7.42E+03	1.60E-02	1.60E-02	1.60E-02	---	1.60E-02
Acenaphthylene	7.42E+03	4.40E-02	4.40E-02	4.40E-02	---	4.40E-02

TABLE 2 - EXTENT EVALUATION COMPARISON VALUES⁽¹⁾

Chemicals of Interest	Potential Preliminary Screening Values (PSVs) from Table 21 of RI/FS Workplan ⁽²⁾			PSV (mg/kg)	Potential Site-Specific Background Values ⁽⁶⁾	Extent Evaluation Comparison Value
	Tot Sed _{Comb} ⁽³⁾	TCEQ Ecological Benchmark for Sediment ⁽⁴⁾	EPA EcoTox Threshold ⁽⁵⁾			
Acetophenone	1.53E+04	---	---	1.53E+04	---	1.53E+04
Aniline	1.07E+03	---	---	1.07E+03	---	1.07E+03
Anthracene	3.71E+04	8.53E-02	8.53E-02	8.53E-02	---	8.53E-02
Atrazine (Aatrex)	6.40E+01	---	---	6.40E+01	---	6.40E+01
Benzaldehyde	7.35E+04	---	---	7.35E+04	---	7.35E+04
Benzidine	6.18E-02	---	---	6.18E-02	---	6.18E-02
Benzo(a)anthracene	1.59E+01	2.61E-01	2.61E-01	2.61E-01	---	2.61E-01
Benzo(a)pyrene	1.59E+00	4.30E-01	4.30E-01	4.30E-01	---	4.30E-01
Benzo(b)fluoranthene	1.59E+01	---	---	1.59E+01	---	1.59E+01
Benzo(g,h,i)perylene	3.71E+03	---	---	3.71E+03	---	3.71E+03
Benzo(k)fluoranthene	1.59E+02	---	---	1.59E+02	---	1.59E+02
Benzoic acid	6.12E+05	---	---	6.12E+05	---	6.12E+05
Benzyl alcohol	4.59E+04	---	---	4.59E+04	---	4.59E+04
Biphenyl	7.65E+03	---	1.10E+00	1.10E+00	---	1.10E+00
Bis(2-Chloroethoxy)methane	1.29E+01	---	---	1.29E+01	---	1.29E+01
Bis(2-Chloroethyl)ether	4.95E+01	---	---	4.95E+01	---	4.95E+01
Bis(2-Chloroisopropyl)ether	2.03E+02	---	---	2.03E+02	---	2.03E+02
Bis(2-Ethylhexyl)phthalate	2.44E+02	1.82E-01	1.82E-01	1.82E-01	---	1.82E-01
Butyl benzyl phthalate	3.06E+04	---	1.10E+01	1.10E+01	---	1.10E+01
Caprolactam	7.65E+04	---	---	7.65E+04	---	7.65E+04
Carbazole	7.10E+02	---	---	7.10E+02	---	7.10E+02
Chrysene	1.59E+03	3.84E-01	3.84E-01	3.84E-01	---	3.84E-01
Dibenz(a,h)anthracene	1.59E+00	6.34E-02	6.34E-02	6.34E-02	---	6.34E-02
Dibenzofuran	6.12E+02	---	2.00E+00	2.00E+00	---	2.00E+00
Diethyl phthalate	1.22E+05	---	6.30E-01	6.30E-01	---	6.30E-01
Dimethyl phthalate	1.22E+05	---	---	1.22E+05	---	1.22E+05
Di-n-butyl phthalate	1.53E+04	---	1.10E+01	1.10E+01	---	1.10E+01
Di-n-octyl phthalate	3.06E+03	---	---	3.06E+03	---	3.06E+03
Fluoranthene	4.95E+03	6.00E-01	6.00E-01	6.00E-01	---	6.00E-01
Fluorene	4.95E+03	1.90E-02	1.90E-02	1.90E-02	---	1.90E-02
Hexachlorobenzene	8.88E+00	---	---	8.88E+00	---	8.88E+00

TABLE 2 - EXTENT EVALUATION COMPARISON VALUES⁽¹⁾

Chemicals of Interest	Potential Preliminary Screening Values (PSVs) from Table 21 of RI/FS Workplan ⁽²⁾			PSV (mg/kg)	Potential Site-Specific Background Values ⁽⁶⁾	Extent Evaluation Comparison Value
	TotSed _{Comb} ⁽³⁾	TCEQ Ecological Benchmark for Sediment ⁽⁴⁾	EPA EcoTox Threshold ⁽⁵⁾			
Hexachlorocyclopentadiene	9.19E+02	---	---	9.19E+02	---	9.19E+02
Hexachloroethane	1.53E+02	---	1.00E+00	1.00E+00	---	1.00E+00
Indeno(1,2,3-cd)pyrene	1.59E+01	---	---	1.59E+01	---	1.59E+01
Isophorone	1.50E+04	---	---	1.50E+04	---	1.50E+04
Nitrobenzene	7.65E+01	---	---	7.65E+01	---	7.65E+01
n-Nitrosodimethylamine	1.07E+00	---	---	1.07E+00	---	1.07E+00
n-Nitrosodi-n-propylamine	6.31E-01	---	---	6.31E-01	---	6.31E-01
n-Nitrosodiphenylamine	9.01E+02	---	---	9.01E+02	---	9.01E+02
o-Cresol	7.65E+03	---	---	7.65E+03	---	7.65E+03
Pentachlorophenol	5.61E+01	---	---	5.61E+01	---	5.61E+01
Phenanthrene	3.71E+03	2.40E-01	2.40E-01	2.40E-01	---	2.40E-01
Phenol	4.59E+04	---	---	4.59E+04	---	4.59E+04
Pyrene	3.71E+03	6.65E-01	6.65E-01	6.65E-01	---	6.65E-01
Pyridine	7.35E+02	---	---	7.35E+02	---	7.35E+02
Chloride	---	---	---	NV	NV	NV
Sulfate	---	---	---	NV	NV	NV
Total Moisture	---	---	---	NV	NV	NV
Total Organic Carbon	---	---	---	NV	NV	NV

Notes

1. All values in mg/kg.
2. Values from Table 21 of RI/FS Workplan unless indicated otherwise (updated to reflect changes since 2005)
3. TotSed_{Comb} PCL = TCEQ Protective Concentration Level for total sediment combined pathway (includes inhalation; ingestion; dermal pathways).
4. From Table 3-3 of TCEQ "Guidance for Conducting Ecological Risk Assessments at Remediation Sites in Texas".
5. From Table 2 of EPA "Ecotox Thresholds" ECO Update January 1996.
6. 95% UTL calculated from site-specific background samples.
7. NV = No Preliminary Screening Value.

TABLE 3 - DETECTED WETLAND SEDIMENT CONCENTRATIONS EXCEEDING PSVS AND BACKGROUND

Sample Location	Sample Depth (ft)	Chemical of Interest	Concentration (mg/kg)	Extent Evaluation Comparison Value (mg/kg) ⁽¹⁾
NA1SE01	0-0.5	4,4'-DDT	0.00204J	0.00119
NA2SE02	0-0.5	4,4'-DDT	0.00194J	0.00119
NA3SE03	0-0.5	4,4'-DDT	0.0016J	0.00119
NA4SE04	0-0.5	4,4'-DDT	0.00454J	0.00119
		Zinc	202	150
NB1SE05	0-0.5	Nickel	23.1	20.9
NB2SE06	1-2	2-Methylnaphthalene	0.43	0.07
		Acenaphthene	0.037J	0.016
		Fluorene	0.088	0.019
NB3SE07	0-0.5	4,4'-DDT	0.00186J	0.00119
NB4SE08	0-0.5	4,4'-DDT	0.00922J+	0.00119
		Acenaphthene	0.113	0.016
		Anthracene	0.188	0.0853
		Benzo(a)anthracene	0.993	0.261
		Benzo(a)pyrene	1.3J	0.43
		Chrysene	1.27	0.384
		Copper	39.6	34
		Dibenz(a,h)anthracene	0.337J-	0.0634
		Fluoranthene	2.17	0.6
		Fluorene	0.127	0.019
		Lead	88.1	46.7
		Phenanthrene	1.3	0.24
		Pyrene	1.64J-	0.665
		Zinc	601	150
NC3SE11	0-0.5	4,4'-DDT	0.00143J	0.00119
NC4SE12	0-0.5	4,4'-DDT	0.00468J+	0.00119
		Zinc	263	150

TABLE 3 - DETECTED WETLAND SEDIMENT CONCENTRATIONS EXCEEDING PSVS AND BACKGROUND

Sample Location	Sample Depth (ft)	Chemical of Interest	Concentration (mg/kg)	Extent Evaluation Comparison Value (mg/kg) ⁽¹⁾
NF4SE13	0-0.5	4,4'-DDT	0.00254J+	0.00119
		Arsenic	12.8	8.66
		Copper	35.7	34
		Lead	64.7	46.7
		Nickel	27.7	20.9
		Zinc	903	150
NG1SE14	0-0.5	Nickel	23.8	20.9
		Zinc	153	150
NG2SE15	0-0.5	4,4'-DDT	0.00189J	0.00119
NG4SE17	0-0.5	Dieldrin	0.00266	0.000715
		Zinc	255	150
2WSED3	0-0.5	Acenaphthylene	0.346J	0.044
		Anthracene	0.241J	0.0853
		Benzo(a)pyrene	0.631J	0.43
		Chrysene	2.73	0.384
		Dibenz(a,h)anthracene	2.83	0.0634
		Pyrene	0.729J	0.665
2WSED4	0-0.5	4,4'-DDE	0.00256J	0.00207
		Acenaphthylene	0.545J	0.044
		Anthracene	0.334J	0.0853
		Benzo(a)pyrene	0.972	0.43
		Chrysene	4.05	0.384
		Dibenz(a,h)anthracene	2.91	0.0634
		Dieldrin	0.00211J	0.000715
		Nickel	21.3	20.9
		Pyrene	1.18	0.665
2WSED5	0-0.5	Acenaphthylene	0.139J	0.044
		Dibenz(a,h)anthracene	1.83	0.0634

TABLE 3 - DETECTED WETLAND SEDIMENT CONCENTRATIONS EXCEEDING PSVS AND BACKGROUND

Sample Location	Sample Depth (ft)	Chemical of Interest	Concentration (mg/kg)	Extent Evaluation Comparison Value (mg/kg) ⁽¹⁾
2WSED9	0-0.5	4,4'-DDT Dibenz(a,h)anthracene	0.00206J 0.129	0.00119 0.0634
2WSED10	0-0.5	4,4'-DDT	0.0015J	0.00119
2WSED12	0-0.5	4,4'-DDT	0.00212J	0.00119
2WSED15	0-0.5	Chrysene Copper Lead Zinc	0.39J 49 50 539	0.384 34 46.7 150
2WSED17	0-0.5	Acenaphthene Anthracene Benzo(a)anthracene Benzo(a)pyrene Chrysene Dibenz(a,h)anthracene Fluoranthene Fluorene Lead Phenanthrene Pyrene Zinc	0.133 0.257 0.724 0.618 0.743 	0.016 0.0853 0.261 0.43 0.384 0.0634 0.6 0.019 46.7 0.24 0.665 150

Notes:

(1) See Table 1.

(2) Data Qualifiers: J = estimated value; J- = estimated value, biased low; J+ = estimated value, biased high.

TABLE 4 - PROPOSED WETLAND SEDIMENT SAMPLE ANALYSES

Sample Location(s)	Sample Depth (ft)	Analytical Parameter
3WSED1	0-0.5	4,4'-DDT Zinc
3WSED2	0-0.5	4,4'-DDT Zinc
3WSED3	0-0.5	4,4'-DDT
3WSED4	0-0.5	4,4'-DDT
3WSED5	0-0.5	4,4'-DDT Nickel
3WSED6	0-0.5	4,4'-DDT Nickel
3WSED7	0-0.5	4,4'-DDT
3WSED8	0-0.5	4,4'-DDT Dieldrin Zinc
3WSED9	0-0.5	Dieldrin Zinc
2WSED8, 2WSED9, 2WSED10	1-2 ⁽¹⁾	VOCs ⁽²⁾ SVOCs ⁽³⁾ Pesticides ⁽⁴⁾ Metals ⁽⁵⁾ PCBs ⁽⁶⁾ Grain-size Total organic carbon

Notes:

- (1) Sample will not be collected if saturated conditions are observed at a depth of 2 feet or less.
- (2) All VOCs listed in Table B-4 of Field Sampling Plan
- (3) All SVOCs listed in Table B-4 of Field Sampling Plan
- (4) All pesticides listed in Table B-4 of Field Sampling Plan
- (5) All metals listed in Table B-4 of Field Sampling Plan except chromium (VI)
- (6) All PCBs listed in Table B-4 of Field Sampling Plan